

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
WEST PALM BEACH DIVISION

Case No. 9:23-cv-81373- MIDDLEBROOKS/Matthewman

CONSUMER FINANCIAL PROTECTION  
BUREAU,

Plaintiff,

V.

FREEDOM MORTGAGE CORPORATION,

Defendant.

**JOINT MOTION FOR EXTENSION OF TIME FOR DEFENDANT FREEDOM  
MORTGAGE CORPORATION TO COMPLY WITH COURT ORDER AND FOR  
THE CFPB TO FURNISH A REBUTTAL EXPERT REPORT**

Plaintiff Consumer Financial Protection Bureau (CFPB) and Defendant Freedom Mortgage Corporation (Freedom) move jointly for an extension of time for Freedom to comply with the Court's Order of March 18, 2024 (Dkt. 47) from March 26, 2024 to April 2, 2024; and for the time for the CFPB to furnish a rebuttal expert report from April 18, 2024 to April 25, 2024.

Freedom is diligently working on compliance with the Order, but the magnitude of potentially responsive documents it has identified makes compliance with the March 26, 2024 deadline for production impossible. The CFPB has agreed to a one-week extension based on Freedom's representations that this will give Freedom sufficient time to process and produce documents to fully comply with the Court's Order. In addition, Freedom agrees that the CFPB may have a one-week extension to furnish a

rebuttal expert report so that the CFPB has sufficient time to review the documents produced by Freedom and to respond to any expert report offered by Freedom.

In response to the Court's Order, Freedom promptly began searching for responsive documents within the additional time frame compelled by the Order of January 1, 2022 to October 10, 2023. *See* Dkt. 47 at 12. Freedom identified over 225 GB of data that may contain such responsive documents. Freedom began the upload process on Friday, March 22, and worked through the weekend to complete the upload process on Monday, March 25. As of the time of this filing, Freedom's e-discovery vendor has begun processing the documents so that Freedom's attorneys can review for responsiveness and privilege. Freedom's attorneys will then instruct the e-discovery vendor to process responsive, non-privileged materials for production. Freedom is confident that it can complete this process and make the production by April 2.

In addition, Freedom has agreed that the CFPB's deadline to submit a rebuttal expert report may be extended from April 18, 2024 to April 25, 2024. Should Freedom offer an expert report, the additional week will allow the CFPB to fully review the documents produced by Freedom and prepare any rebuttal report while still allowing Freedom to depose any CFPB rebuttal expert before the May 2 deadline on expert discovery.

No party will suffer prejudice if the Court agrees and grants this Motion. The proposed modification of the schedule will neither affect other dates or deadlines nor materially delay resolution of the action. A proposed order is attached to this Motion.

Dated: March 25, 2024

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on March 25, 2024, I electronically filed the foregoing document with the Clerk of Court using CM/ECF, which will provide automatic email notice and service of the foregoing filing to counsel of record.

/s/ Herman J. Russomanno III